

Application No : 10/085796

SMQ-084/P6463

**REMARKS**

Applicants amend claims 18 and 19 due to minor errors such as claim 18 cannot be dependent on itself. Applicants respectfully request that the Examiner consider entering the claim amendments, as they do not introduce any new matter. Upon entry of this amendment, claims 1-9 and 11-22 are presented for examination, of which claims 1, 11, 15, 17 are independent. For the reasons set forth below, Applicants respectfully submit that the pending claims define over the art of record.

**Claim Rejections under 35 U.S.C. §112**

The Examiner rejects claims 1 and 17 for insufficient antecedent basis for the limitation "managing items." Applicants respectfully submit that the term "managing items" are supported by various sections of the specification, such as page 3 lines 22-25. Applicants respectfully request that the Examiner reconsider and withdraw the outstanding rejection.

**Claim Rejections under 35 U.S.C. §103**

Claims 1-9 and 11-22 are rejected under 35 U.S.C. 103(a) as being unpatentable over United States Patent No. 6,141,660 to Bach et al. (hereafter "Bach") in view of United States Patent Publication No. 20030051008 to Gorthy et al. (hereafter "Gorthy"). To establish a prima facie case of obviousness, the prior art references, either alone or in combination, must teach or suggest each and every element of the rejected claims. Applicants respectfully submit that Bach and Gorthy, either alone or in combination, do not teach or suggest the claim limitation of translating a request into one or more command line interface (CLI) commands, where the request is a web browser request issued by a client to a server as required by claims 1, 11, 15, and 17.

The present invention provides a method to translate web browser requests into CLI commands. User interfaces provided by web browsers are easier to use than CLIs, but some CLIs are more powerful to utilize. An advantage of the present invention is that a web browser on a client provides users with an easy user interface to interface with a server and the server translates the web browser requests into CLI commands with a management application to enable more powerful and efficient execution on the server.

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Bach discusses a method and system for generating an object-orientated application that can access a hierarchical database. Bach discusses the use of web browsers to interact with application programs and objects frameworks, but no where does Bach teach or suggest translating a request into one or more CLI commands where the request is a web browser request issued by a client to a server as required by claims 1, 11, 15, and 17.

Gorthy fails to cure the deficiency of Bach. Gorthy focuses on a method to translate between XML and CLI commands so that the method may be utilized to configure routers made by manufacturers, such as Cisco, that face interface-upgrade problems. However, XML is not a protocol that may be used to form a web browser request. Furthermore, nowhere does Gorthy discuss the use of a web browser, thus Gorthy cannot teach how to translate a web browser request to CLI commands. Therefore, Applicants respectfully submit that Gorthy does not teach or suggest translating a request into one or more CLI commands where the request is a web browser request issued by a client to a server as required by claims 1, 11, 15, and 17.

Accordingly, Bach and Gorthy, either alone or in combination, do not teach or suggest the limitation of translating the request into one or more CLI commands, where the request is a web browser request issued by a client to a server as required by claims 1, 11, 15, and 17.

Furthermore, there is no motivation to combine Bach and Gorthy. Bach is focused on how to access a database where Gorthy is focused on how to configure a router. Bach and Gorthy solve very different problems in two very different fields and the nature of the problems are not related. Bach wants to improve the techniques for accessing a database using an object-oriented application and Gorthy introduces a user-friendly XML-based interface to configure existing and next-generation devices for manufacturers, such as Cisco, who utilize CLI commands to configure their routers. Applicants respectfully submit that one of ordinary skill in the art will not relate these two references with each other. Furthermore, neither is there known interest in the particular fields of Bach or Gorthy to combine these two references, nor are the nature of the problems solved by Bach and Gorthy alike to have the motivation to combine the two references.

Accordingly, Applicants respectfully request that the Examiner reconsider and withdraw the rejection of independent claims 1, 11, 15, and 17. Dependent claims 2-9, 12-14, 16, 18-22

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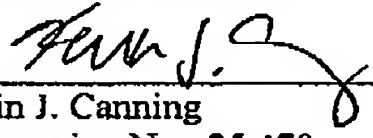
depend from one of independent claims 1, 11, 15, and 17 and include all the limitations of the corresponding independent claim. Applicants respectfully request that the Examiner reconsider and withdraw the rejections of independent claims 1, 11, 15, and 17, and their dependent claims 2-9, 12-24, 16, 18-22.

In view of the above amendment, Applicants believe the pending application is in condition for allowance.

Applicants believe no fee is due with this statement. However, if a fee is due, please charge our Deposit Account No. 12-0080, under Order No. SMQ-084 from which the undersigned is authorized to draw.

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Respectfully submitted,

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